

Andre' Lamont Grayson

FULL NAME

West Valley Detention Center

COMMITTED NAME (if different)

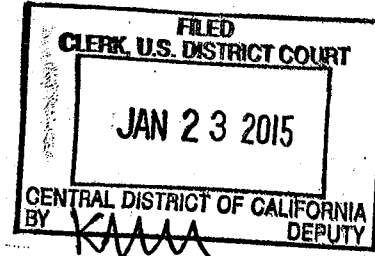
9500 Etiwanda Avenue

FULL ADDRESS INCLUDING NAME OF INSTITUTION

Rancho Cucamonga, CA 91739

1306340123

PRISON NUMBER (if applicable)



UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Andre' Lamont Grayson

V.

PLAINTIFF,

SAN BERNARDINO CNTY: Rialto Police Dept.
Chief, Tony Farrar, Officer Keetle,
Officer Austin, Dossey

DEFENDANT(S).

EDCV15-0145VBF(E)

To be supplied by the Clerk

CIVIL RIGHTS COMPLAINT
PURSUANT TO (Check one)

☒ 42 U.S.C. § 1983

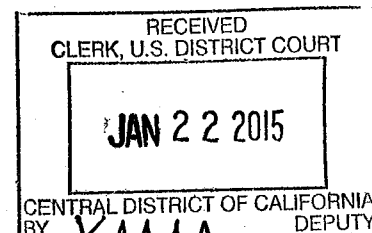
☐ Bivens v. Six Unknown Agents 403 U.S. 388 (1971)

A. PREVIOUS LAWSUITS

1. Have you brought any other lawsuits in a federal court while a prisoner: ☐ Yes ☒ No

2. If your answer to "1." is yes, how many? Not Applicable (N/A)

Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on an attached piece of paper using the same outline.)



- a. Parties to this previous lawsuit:
Plaintiff _____

N/A

Defendants _____

- b. Court _____

- c. Docket or case number _____

- d. Name of judge to whom case was assigned _____

- e. Disposition (For example: Was the case dismissed? If so, what was the basis for dismissal? Was it appealed? Is it still pending?) _____

- f. Issues raised: _____

- g. Approximate date of filing lawsuit: _____

- h. Approximate date of disposition _____

B. EXHAUSTION OF ADMINISTRATIVE REMEDIES

1. Is there a grievance procedure available at the institution where the events relating to your current complaint occurred? ☐ Yes ☒ No

2. Have you filed a grievance concerning the facts relating to your current complaint? ☐ Yes ☒ No

If your answer is no, explain why not The Rialto Police Dept. Doesn't House Detainees, AND since Plaintiff WAS Released from their custody, this remedy he's exempted from.

3. Is the grievance procedure completed? ☐ Yes ☒ No

N/A

If your answer is no, explain why not _____

4. Please attach copies of papers related to the grievance procedure.

C. JURISDICTION

This complaint alleges that the civil rights of plaintiff Andre' Lamont Grayson

(print plaintiff's name)

who presently resides at 9500 Etiwanda Avenue, Rancho Cucamonga, CA 91739

(mailing address or place of confinement)

were violated by the actions of the defendant(s) named below, which actions were directed against plaintiff at

A Public Area, At A Public bus Stop Within the City Rialto CA.

(institution/city where violation occurred)

CIVIL RIGHTS COMPLAINT

1. Defendant SAN BERNARDINO County resides or works at
(full name of first defendant)
247 W. 3rd st. SAN BERNARDINO CA 92415
(full address of first defendant)
A Municipality And Principality
(defendant's position and title, if any)

Defendant is the Principality from Authority of the state Is Delegated to Public entities AND their Employees.

2. Defendant City of Rialto AND Rialto Police Dept resides or works at
(full name of first defendant)
128 N. Willow Ave Rialto, CA
(full address of first defendant)
A Municipality AND Principality.
(defendant's position and title, if any)

Defendant is the Municipality Authority of the state is Passed on to via the County of SAN BERNARDINO, AS well AS the Public Entity Identified.

3. Defendant Tony FARRAR resides or works at 128 N. Willow Ave Rialto, CA
(full name of first defendant)
(full address of first defendant)
Chief of Police
(defendant's position and title, if any)

Defendant is Policy maker Authority of Dept. Defendant Officers Are employed, AND Allows / Creates the Customs AND Practices Injuring ME.

4. Defendant Officer Keetle resides or works at
(full name of first defendant)
128 N. Willow Ave Rialto, Ca.
(full address of first defendant)
Rialto Police Officer
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

Defendant was employed and acted under state Authority
At the time of injury to plaintiff.

5. Defendant Austin, Dossey resides or works at
(full name of first defendant)
128 N. Willow Ave Rialto, Ca.
(full address of first defendant)
Rialto Police Officer
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

Defendant was employed and acted under State
Authority At the time of injury to plaintiff.

D. CLAIMS***CLAIM I**

The following civil right has been violated:

The Plaintiffs 5th, 8th AND 14th Amendment right of the U.S Constitution Were Violated by the UNNECESSARY AND MILICIOUS use of deadly force AND the UNNECESSARY AND MILICIOUS use of Physical force. Both PRIDE to ACT OF detaining PLAINTIFF by fair due Process, AND After detaining him IN their custody. Thus, denying him equal Protection of the laws of the state, AND exposing him to cruel AND unusual Punishment while IN their custody AND his CUSTODIANS.

Supporting Facts: Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be certain you describe, in separately numbered paragraphs, exactly what each DEFENDANT (by name) did to violate your right.

1. ON JUNE 1, 2013, PLAINTIFF WAS AT the city Omni TRANS Bus stop AT About 5:00 pm, when he began to cross the street, AT All times he watched traffic AND noticed AN ON-COMING Police cruiser.
2. PLAINTIFF observed the driver to be busy on his computer, AND/or texting AND not looking AT the road when with deadly force he struck plaintiff with his vehicle. Officer Keetle WAS Allegedly ON call, with A civilian who WAS IN A separate vehicle behind this defendant, while they looked for the civilian son, when PLAINTIFF WAS struck by the impact of the police cruiser.
3. AS PLAINTIFF stood in front of Police cruiser. Officer Keetle got out his vehicle AND order

*If there is more than one claim, describe the additional claim(s) on another attached piece of paper using the same outline.

E. REQUEST FOR RELIEF

I believe that I am entitled to the following specific relief:

Compensatory Damages Reliefs Is Requested IN the sum of \$ 1.8 million Dollars, for the PAIN AND suffering experienced by the PLAINTIFF from the Acts of Injury by defendants, AS well AS the PAIN AND suffering AND humiliation he endured due to the pain suffering AND humiliation his family AND friends endured AT what occurred to PLAINTIFF.


Wherefore, AS relief, It Is requested nominal AND Punitive Damage be Also Awarded AT A ratio Affixed by the Judge AND /or Jury.

In Addition, AN Injunctive order IN re use ON-board LAP-top Computer of Police Cruiser should be, AND Is requested Issued to stop Its use while Patrols Are IN motion or within Flow AND LANES OF Traffic.

The Court AND Jury is Asked that, when setting monetary relief Amounts, They Also Keep in mind ANY future suffering s AND/or damages that may Arise IN the future from the events reported herin, AND declare the right of the rights of the Plaintiff.

Respectfully Submitted,

1/19-15
(Date)


(Signature of Plaintiff)

(Page 5 of 6 Continued)

Plaintiff to ground or he was going to taze him. Plaintiff put his hands-up before he could put his hands down WAS tazed AND beat repeatedly with his baton about the body AND face. Plaintiff WAS humiliatingly kick all about his face, legs back AND stomach maliciously.

4. Other responding Officer, defendant Officer Keetle, Officer Dossey began to arrive at scene, AND with milice AND force though joined in ON the assault AND Debsement of Plaintiff, without Jusitification. Officer Dossey beat Plaintiff, who WAS completely in compassitated, with his baton in the plaintiff's face, body, back, ribs AND legs AND then used his fist to strike Plaintiff's face repeatedly. While Keetle struck Plaintiff (10) to 15 times with his baton.

5. Defendant Officer Keetle, Officer Dossey are the sole reason I now suffer multiple servere head aches, back aches AND SCARS for the beating AND stiches I've suffered through, from a torturous beating that left AN entire side of A patrol cruiser covered with my blood.

b. The careless act of driving while also texting, AND/or using Patrol Cruiser's on-board lap-top style computer, IS A Practice AND Accepted custom of the police department Officers, Which has gone without the County, City or the Police Dept. AND it's Chief ever Attempting to curb or stop this dangerous AND reckless/ Neglegent Practices used by A MAJORITY of the LAW enforcement Officers.

OVERT

7. Said Practice AND custom is so common that it is Institutionalized, AS well AS part of they STANDARD training regime.

8. Thus the prestatcd herein is the cause AND basis for all of the PLAINTIFF'S suffering, pain, humiliation AND metal Anguish from the shock AND fear he did suffer AND continues to suffer After, the defendANT'S Attack ON him AS Peace Officers.

Respectfully Submitted,

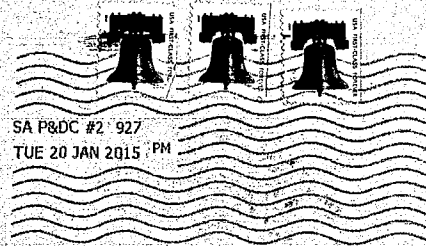
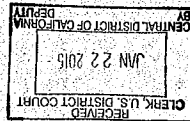
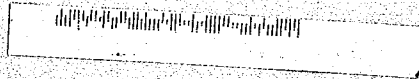
Date 1-19-15

x Andre J. [Signature]

~~Andre L. Grayson~~ 1306340153

W.V.D.C. 9500 Etiwanda S-F-5

Rancho Cucamonga, Ca 91739



1983

United States District Courts
Central District of California
312 North Spring Street Room G-8
Los Angeles, Ca. 90012
Attention: PRO SE CLERK

